

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**CARL O. WILLIAMS**  
*Plaintiff,*

**v.**

**SHELL OIL COMPANY**  
*Defendant.*

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**CAUSE NO. 4:20-cv-04295**

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**MOTION TO SEAL SUMMARY JUDGMENT EVIDENCE**

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TO THE HONORABLE U.S. DISTRICT COURT JUDGE:

NOW COMES Plaintiff Carl Williams (hereinafter referred to as “Plaintiff”) in the above-referenced matter, complaining of and about Defendant Shell Oil Company, and respectfully requests to file a Motion to Seal documents attached to Plaintiff’s Summary Judgment Response and supplemental appendix.

**SUMMARY**

Plaintiff files this Motion to Request to Seal ‘attorney eyes only confidential’ documents produced in response to summary judgment, as mentioned in the protective order. According to Local Rule 12(b), Plaintiff is seeking permission to seal certain documents produced as summary judgment evidence, which Defendant has indicated as ‘Confidential.’ These ‘Confidential’ documents have been filed under seal simultaneously. We request the Court to review the documents filed under seal and determine whether those documents need to be removed and placed under seal.

Respectfully submitted,



/s/ Eddie Hodges Jr.

Eddie Hodges Jr.

Texas Bar No. 24116523

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I certify that I served a true and correct copy of this document on all counsel of record, as listed below, via the Case Management Electronic Case Filing (CM/ECF) System for the U.S. District Court for the Southern District of Texas, on February 2, 2022.

Alfonso Kennard Jr.

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**PLAINTIFF CARL WILLIAMS’ SUPPLEMENTAL ‘CONFIDENTIAL’ APPENDIX IN  
OPPOSITION TO DEFENDANT SHELL OIL COMPANY’S MOTION FOR SUMMARY  
JUDGMENT**

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Plaintiff respectfully submits this Supplemental “Confidential” Appendix under seal in support of its Opposition to the Motion for Summary Judgment.

<b>APPENDIX</b>	<b>DESCRIPTION</b>
PS-001 – PS-007	Emails from Xavier Puvilland Highlighting “Recent Wins” amongst all BDMS under his supervision
PS-008 – PS-014	Emails from Xavier Puvilland to Carl Williams regarding monthly “YTD Sales KPIs Report” for August 2019, September 2019, October 2019, November 2019, and December 2019.

Dated: February 2, 2022

Respectfully submitted,



/s/ Eddie Hodges Jr.  
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Alfonso Kennard Jr.